

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA : CRIMINAL NO. \_\_\_\_\_  
v. : DATE FILED: \_\_\_\_\_  
ANTHONY DOUGLAS ELONIS : VIOLATIONS:  
: 18 U.S.C. § 875(c) (interstate  
: communication of threats - 5 counts)

INDICTMENT

COUNT ONE

**THE GRAND JURY CHARGES THAT:**

On or about October 19, 2010, through on or about October 22, 2010, in Bethlehem, in the Eastern District of Pennsylvania, and elsewhere, defendant

**ANTHONY DOUGLAS ELONIS**

knowingly and willfully transmitted in interstate and foreign commerce, via a computer and the Internet, a threatening communication to others, that is, a communication containing a threat to injure the person of another, specifically, a threat to injure patrons and employees of Dorney Park and Wildwater Kingdom, located in Allentown, Pennsylvania.

In violation of Title 18, United States Code, Section 875(c).

**COUNT TWO**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about November 6, 2010, through on or about November 15, 2010, in Bethlehem, in the Eastern District of Pennsylvania, and elsewhere, defendant

**ANTHONY DOUGLAS ELONIS**

knowingly and willfully transmitted in interstate and foreign commerce, via a computer and the Internet, a communication to others, that is, a communication containing a threat to injure the person of another, specifically, a threat to injure and kill T.E., a person known to the grand jury.

In violation of Title 18, United States Code, Section 875(c).

**COUNT THREE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about November 15, 2010, in Bethlehem, in the Eastern District of Pennsylvania, and elsewhere, defendant

**ANTHONY DOUGLAS ELONIS**

knowingly and willfully transmitted in interstate and foreign commerce, via a computer and the Internet, a threatening communication to others, that is, a communication containing a threat to injure the person of another, specifically, a threat to injure employees of the Pennsylvania State Police and the Berks County Sheriff's Department.

In violation of Title 18, United States Code, Section 875(c).

**COUNT FOUR**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about November 16, 2010, in Bethlehem, in the Eastern District of Pennsylvania, and elsewhere, defendant

**ANTHONY DOUGLAS ELONIS**

knowingly and willfully transmitted in interstate and foreign commerce, via a computer and the Internet, a threatening communication to others, that is, a communication containing a threat to injure the person of another, specifically, a threat to injure a kindergarten class of elementary school children.

In violation of Title 18, United States Code, Section 875(c).

**COUNT FIVE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about November 30, 2010, in Bethlehem, in the Eastern District of Pennsylvania, and elsewhere, the defendant

**ANTHONY DOUGLAS ELONIS**

knowingly and willfully transmitted in interstate and foreign commerce, via a computer and the Internet, a threatening communication to others, that is, a communication containing a threat to injure the person of another, specifically, a threat to injure an agent of the Federal Bureau of Investigation.

In violation of Title 18, United States Code, Section 875(c).

**A TRUE BILL:**

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**GRAND JURY FOREPERSON**

*Christine E. Sues for*  
ZANE DAVID MEMEGER  
United States Attorney